

To: Daly, Eric[Daly.Eric@epa.gov]; Oldland, Colin[Oldland.Colin@epa.gov]
Cc: Rotola, Joe[Rotola.Joe@epa.gov]; Gottesman, Justin[gottesman.justin@epa.gov]
From: Pane, Mark
Sent: Tue 8/9/2016 7:22:55 PM
Subject: RE: Niagara Falls Boulevard T&D-US Army Corps

Eric,

The money saving concept is a good one. However, after speaking with Justin I am not sure that any cost or time savings will be realized by pursuing disposal through the COE.

To access the COE, EPA would have to enter into an Inter-agency agreement. We would then fund the IA for the disposal costs. This process may take several weeks to execute. Once funded, the COE would pursue their BPA agreements for disposal which would take them at least 4 weeks. That time frame begins after you have a completed SOW, which would likely also take a few weeks to finalize. The COE will bill EPA for the services to generate the BPA as well as oversight costs for the duration the BPA is in use. The COE will also apply their G&A to all costs they incur.

As these plans are not fixed yet, I can not determine the cost feasibility of this option. If you want to pursue this option, please keep these factors in mind when determining the overall cost. Also be aware of the time considerations it would take to implement this option vs. proceeding through an ERRS subcontract.

In my opinion, the level of effort, timeframe and cost of implementing this option will exceed the alternate approach of subcontracting through ERRS.

Mark

From: Daly, Eric
Sent: Tuesday, August 09, 2016 10:47 AM
To: Pane, Mark <Pane.Mark@epa.gov>; Oldland, Colin <Oldland.Colin@epa.gov>
Subject: Niagara Falls Boulevard T&D-US Army Corps
Importance: High

Good Morning Mark P.

How are you? I have been researching radiological T&D for the sites for some time now. In planning for the action memo, we started by having Weston's Health Physicist look into disposal facilities for estimates. Those two companies were US Ecology and Energy Solutions. Turns out from my research, they are the only two disposal facilities that are accepted by our region. Cost analysis shows that Energy Solutions price quote was double that of US Ecology. So in reality, in the end we will be using US Ecology. I contacted both disposal facilities in anticipation of a bid through GES. I also contacted Rick Robinson (RPM at Welsbach) to pick his brain. One thing he brought up was an existing Corps of Engineer contract that EPA Remedial use for their rad sites (I believe Betsy Donovan also uses on her rad sites). So I started looking into it. I was put in touch with Justin Gottesman who handles the contract for Remedial. This is a response to Justin from the Corps representative:

Hello Justin,

We have the 4 Rad Disposal BPAs which can include Transport as well. Each have 7 million in capacity right now with an ordering period of 5 years. We can have awarded in 4 weeks of getting PWS done and save EPA prime contractor markup. Our very limited knowledge of this project is EPA has roughly 10,000 tons of wastes to dispose of. That would fit well into the BPAs and I think they/we would get a fair price from the BPAs.

Of course we would have to have some additional discussion on this regarding timing etc., since this is the end of the FY.

Advantages of going this route would be no ERRS markup, we would be consistent with the other rad sites, the corps would work with GES in order to prepare shipment properly and overall cost savings. Basically, we will be using US Ecology regardless as disposal facility. Either through existing contract or individually by paying more through ERRS and paying higher prices for US Ecology. I confirmed this with US Ecology yesterday. I wanted to involve you and Mark O. as soon as I possible in order to address any financial/contractual questions. For instance, what's the mechanism for releasing money (EAS) or what does EPA fund up front? I will copy you and Mark O. to my future emails to Justin. If there is any information you have on this already or questions you have up front, please let me know. I would like to proceed with this unless there is some unforeseen obstacle. Thanks

USEPA

Justin Gottesman

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We have the 4 Rad Disposal BPAs which can include Transport as well. Each have 7 million in capacity right now with an ordering period of 5 years. We can have awarded in 4 weeks of getting PWS done and save EPA prime contractor markup. Our very limited knowledge of this project is EPA has roughly 10,000 tons of wastes to dispose of. That would fit well into the BPAs and I think they/we would get a fair price from the BPAs.

Of course we would have to have some additional discussion on this regarding timing etc., since this is the end of the FY.

Respectfully,

Regards,

Eric

"We must, indeed, all hang together, or assuredly we shall all hang separately", Benjamin Franklin

Eric M. Daly

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